

REMARKS

The Applicant appreciates the Examiner's indication of allowable subject matter and that Claim 20 would be allowable if re-written to independent form.

An Information Disclosure Statement is filed concurrently with these remarks. The Applicant appreciates the Examiner's entry of these references in the record of this application.

The undersigned counsel is new to this application and respectfully requests a personal interview prior to any action on the merits. An interview prior to first action is appropriate because issues have been narrowed in prior prosecution, Applicant has paid an additional filing fee, and an interview will assist the undersigned counsel in reaching the most expeditious resolution of this application. Furthermore, the office action dated February 2, 2004 ("the Prior Action") appears to have a word processing error in the first paragraph of page 15, and Applicant respectfully requests clarification of the rejection of claims 14 and 15 under 35 U.S.C. § 103. Further still, the Applicant requests clarification of rejections of claims 14, 15, 18, and 19 as obvious in light of the action's proposed modification of a proposed combination of references. It is unclear what would result from the proposed combination of two cited references or how that combination would be modified further according to a third reference, as discussed below.

If the examiner refuses the undersign's request for a personal interview prior to first action, the Applicant respectfully requests that the rejections of the Prior Action be reconsidered and withdrawn for reasons discussed below.

Pending claims 1-8 and 10-20 were rejected in the Prior Action as anticipated by Abe et al. USP 6,173,253 ("Abe '253"). The Prior Action contends that Abe '253 includes a character joint probability calculating means for calculating a character joint probability that represents a

probability of two neighboring characters appearing immediately next to each other. The Prior Action cites to the following passages in Abe '253 in support of that contention:

Figures 2, 5-8, 10 and 13;

Column 6, lines 63 to column 7, line 7;

Column 8, lines 41-59

Column 9, lines 1-12.

The Prior Action further contends that item 132 of FIG. 2 of Abe '253 constitutes a probability table storing means for storing a table of calculated character joint probabilities. With due respect, Applicant has reviewed the cited figures and passages and is unable to identify any disclosure of a calculation or storage of character joint probabilities. As best understood, the system of Abe '253 generates a dictionary of words. *See, e.g.*, col. 4, lines 15-24. The system appears to build a dictionary of transitions between words (item 132). *See, e.g.*, col. 5, lines 14-19. Applicant fails to see how this disclosure of Abe '235 constitutes a calculation or storage of character joint probability.

The Prior Action further cites to Halstead Jr. et al USP 5,963,893 ("Halstead '893") as anticipating claims 2 and 7-8. The Prior Action contends that Halstead '893 discloses a step of calculating a character joint probability that represents a probability of two neighboring characters appearing immediately next to each other (citing col. 5, lines 16-25). The Prior Action cites Halstead '893 at col. 4, lines 25-32, to support that contention. With due respect, it is not seen how Halstead '893 discloses a step of calculating a character joint probability.

The Prior Action further cites Yamamoto et al USP 6,098,035 ("Yamamoto '035") as anticipating claims 4-6. The Prior Action contends that Yamamoto '035 discloses a method with a step of calculating a character joint probability that represents a probability of two neighboring

characters appearing immediately in a given document database (citing col. 1, lines 57-66).

With due respect, it is not seen how Yamamoto '035 discloses a step of calculating a character joint probability.

The Prior Action further rejected claims 3, 11-15 and 17 as obvious over Halstead '893 in view of Abe '253. The Prior Action contends it would have been obvious to modify Halstead's method such that Halstead's character joint probability be calculated as an appearance probability of a specific character string. As discussed above, it is not seen how Halstead '893 discloses a character joint probability, and therefore no motivation is seen for modifying a non-disclosed step.

The Prior Action further rejected claims 11 and 17 as obvious over Halstead '893 in view of Abe '253. The Prior Action contends it would have been obvious to modify Halstead's method such that a correct division pattern is selected from Halstead's plurality of candidates with reference to calculated character joint probabilities. As discussed above, it is not seen how Halstead '893 discloses a character joint probability, and therefore no motivation is seen for modifying a non-disclosed step.

The Prior Action further rejected claim 12 as obvious over Halstead '893 in view of Abe '253. The Prior Action contends it would have been obvious to modify Halstead's method such that Halstead's score is a product of character joint probabilities at respective division points. As discussed above, it is not seen how Halstead discloses a character joint probability, and therefore no motivation is seen for modifying a non-disclosed step.

The Prior Action further rejected claims 14 and 15 as obvious over Halstead '893 in view of Abe '253. The Prior Action contends it would have been obvious to modify Halstead's method such that Halstead's score is a product of character joint probabilities at respective division

points. The Prior Action appears to have a word processing error in the first paragraph of page 15, and Applicant respectfully requests clarification.

The Prior Action further rejected claim 18 as obvious over Halstead '893 in view of Abe '253 and Yamamoto '035. The Prior Action contends it would have been obvious to combine the method of Halstead '893 and Abe '253 and then to modify the combination such that appropriate character strings are added as unknown words starting from Halstead's and Abe's character positions. With due respect, Applicant is not able to discern from the Prior Action what would be the proposed result of combining Halstead '893 and Abe '253, nor can Applicant discern what would be the motivation for modifying the proposed combination in light of Yamamoto. Applicant respectfully requests clarification.

The Prior Action further rejected claim 19 as obvious in light of Halstead '893 in view of Abe '253 and Hon et al. USP 5,852,801. The Prior Action contends it would have been obvious to combine Halstead '893 and Abe '253 and then to modify the combination such that an unknown word is given a value larger than the dictionary word and that the score is calculated based on the unknown word and the dictionary word to improve the probability of recognizing new words. With due respect, Applicant is not able to discern from the Prior Action what would be the proposed result of combining Halstead '893 and Abe '253, nor can Applicant discern what would be the motivation for modifying the proposed combination in light of Yamamoto. Applicant respectfully requests clarification.

If the examiner refuses an interview prior to first action, the Applicant respectfully requests that the rejections of the Prior Action be reconsidered and withdrawn. For the reasons set forth above, the Applicant respectfully contends that cited references lack the disclosure

attributed to them. Further, the Applicant respectfully requests clarification as to certain rejections.

In making these remarks, the Applicant does not intend to limit the scope of equivalency of any limitation in any claim. The Applicant merely points out that certain cited references are not seen to have disclosures as contended in the Present Action.

The Commissioner is hereby authorized to charge any missing or insufficient fee(s) or credit any overpayment, to Deposit Account No. 19-4293.

Respectfully submitted,



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